

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

In Re: Dwayne White

Debtor(s).

) **Case No: 08-**

)

)

MOTION TO AVOID LIEN

Comes now the Debtor in the above styled matter, by and through his attorney of record, and pursuant to 11USC § 522 (f) , hereby move(s) this Honorable Court to enter an order avoiding the lien of Citifinancial to the extent that such lien impairs an exemption to which the Debtor is entitled, which lien is:

_____ a judicial lien recorded in Book _____ at Page _____ ,
_____ (Copy of recorded Certificate of Judgment
attached.)

X a nonpossessory, nonpurchase-money security interest in any of the following:

1. household goods include; clothing, furniture, appliances, 1 radio, 1 television, 1 VCR, linens, china, crockery, kitchenware, educational materials and educational equipment primarily for the use of minor dependent children of the debtor, medical equipment and supplies, furniture exclusively for the use of minor children or elderly disabled dependants of the debtor, personal effects (including the toys and hobby equipment of minor dependent children and wedding rings) of the debtor and the dependants of the debtor, 1 computer and related equipment.
2. implements, professional books, or tools, of the trade of Debtor or the trade of the dependent of the Debtor; or
3. professionally prescribed health aids for the Debtor or a dependent of the Debtor.

/s/ Rod Cameron Shirley

Rod Cameron Shirley

Attorney for Debtor

NOTICE AND CERTIFICATE OF MAILING

A copy of the foregoing Motion has been filed with the Court. An Order granting said Motion will be entered by the court at the expiration of 23 days from the date of this notice unless said creditor files an objection and request for a hearing with the Court within that time.

I hereby certify that I have served a copy of the foregoing Motion on said creditor and Trustee this the 25th day of January 2008.

/s/ Rod Cameron Shirley

Camron Law-ASB-8512-L52R

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Citifinancial
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